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December 3, 2021

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Hayes, et al.*, No. 20 Cr. 500 (JGK)

Dear Judge Koeltl:

Pursuant to the Court's order of May 11, 2021, ECF No. 71, the government and the Defendants are submitting motions *in limine* and *Daubert* motions to the Court today. The full sets of motion papers will be delivered to Chambers in both hard copy and electronic form.

Having conferred with the government pursuant to the Court's Individual Practices Rule VI.A.2, the parties respectfully seek leave from the Court to file these motions under seal at the present time because their supporting memoranda of law, declarations, and exhibits include materials that the government has designated "Confidential" or "Sensitive" pursuant to the protective orders that have been entered in this case, ECF Nos. 23, 41, 55, and that the moving parties contend are irrelevant, prejudicial, and/or otherwise inadmissible. The parties will confer on proposed redactions.

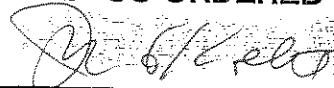
We are available at the Court's convenience to discuss any questions.

Respectfully submitted,

/s/ Douglas K. Yatter

Douglas K. Yatter
Benjamin Naftalis
of LATHAM & WATKINS LLP

APPLICATION GRANTED
SO ORDERED



John G. Koeltl, U.S.D.J.

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LATHAM & WATKINS LLP

cc: James J. Benjamin, Jr. (counsel for Arthur Hayes)
Katherine R. Goldstein (counsel for Arthur Hayes)
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Samuel Raymond
Jessica Greenwood
Nathan Rehn
All Counsel of Record (via ECF)